

Frequently Asked Questions

The Common Emissions Form (CEF)

GENERAL

What does past performance information about the Be Informed vendor mean?

Past performance" means that the Be Informed vendor has worked on solving other complex problems with this software previously, and we want to continue to look at those results to better inform our understanding of the capability of Be Informed to support CAER needs.

How do we find out which states are participating in this?

There are different levels of participation. There are states that have been involved on some of the CAER short term wins, there are states that were involved with the quick start effort, there are states that are involved with other aspects of the facility data management side that's related to CAER. South Carolina, Mississippi, Georgia and Wyoming participated on-site in the Quick Start Workshop with Minnesota as an observer. Massachusetts and Arizona tied in via phone. Other states which are participating on the CAER Team in various aspects include Oklahoma, Massachusetts, Iowa, Nebraska, Connecticut, California, Texas, Arizona, North Carolina, Vermont, Minnesota, South Carolina, Georgia and Southwest Clean Air Agency (WA). Solicitations for participation in sub-groups is done through The Environmental Council of States (ECOS).

Is the CAER website up yet - it is always hard to find responses to the questions that are asked on these webinars but which are not answered.

Yes the [CAER website](#) is available now.

How will expected pollutants be defined? Should mercury from natural gas combustion be reported? It has an AP-42 factor.

Expected pollutants will depend on the particular program requirements that are being modeled, which could include SLT and NEI required pollutants, TRI pollutants, and GHG pollutants. The source correlation can potentially help identify expected pollutants.

How does the subsequent correction/notification/approval process work?

The protocols for QA/QC and validation have not been established yet, but will need to satisfy all the requirements that are currently required in individual programs.

Will CAER replace the bridge tool used to submit into EIS?

We expect that there will be some air agencies who will still need the bridge tool to submit their data to EIS.

The example uses a state (Wyoming). Will local programs that do not report through the state also be able to add their reporting requirements?

Yes. In all cases when we refer to “state”, it means state/local and tribal air agencies.

How will the different reporting periods for the different programs be accommodated?

We did give some thought to this, although during our quick start week we did not try to tackle all the various combinations of SLT and GHT and TRI reporting obligations. In general, the GHG reporting program initial due date is early – it’s about 3 months into the reporting year for the previous year’s emissions and many states had a similar timeframe. The TRI initial due date is in July and in many cases the information on GHGs and state emissions are happening around the same time in the first half of the year. Where the state emission requirements overlap with TRI they would be able to be used to pre-populate TRI. We didn’t look at the case where TRI is due before state reports but you can imagine a similar situation where the information can still be entered through a common form to pre-populate the TRI and then not be submitted to the state until later. You could do other things as well; we just didn’t model those other various possibilities. We think that the system is modular and flexible enough to handle the different reporting periods and deadlines and also helps facilitate the entry and re-use of that information so the same information doesn’t have to be entered over and over again unless there’s different information or changes. The CAER team will be investigating reporting periods in the future.

Is Kansas participating in CAER?

Kansas is not participating on any of the CAER teams at this point. Opportunities will be available as we solicit participants in the priority projects from the CAER Product Development Team.

How is onroad mobile source category is accommodated. May be it is in a plan for the future.

At this time, CAER is being developed for point emissions only.

How will RO certification work for facilities? It didn't appear in the video.

Certification will be discussed as we get further into development. No decisions have been made.

When is the expected implementation date?

The CAER implementation plan is a five-year plan. Don’t think of this as having a date on which everyone will be using this. It’s an iterative process. The plan focuses on working first with priority with state programs and adopting the common form or some similar approach and it’ll probably be a rolling basis. There may be states that are in some of the work flows that you saw, that are ready to proceed as quickly as possible with this type of reporting procedure. Other states, either because of the complexity or there may be hesitancy, whatever reason, may need further time to evaluate. As it is voluntary, some may choose not to adopt the common form

approach at all. The five-year period is set as a goal to see a rolling in of states that would utilize this format and adopt the procedures as it fits their circumstances. This is different than other types of projects where work is done and all dumped out and everyone has to do the same thing. That's not the procedure for this project. There's incremental steps to roll this out. You can see on the workflows that each workflow is associated with a different type of adoptive audience and a period of time depending on complexity and their needs. CAER is being developed using an agile method, and we will be developing and releasing smaller projects, starting with pilot studies, which will move us further towards the CAER goal.

It has not been noted in this presentation that participation is voluntary.

Participation is voluntary. We believe that CAER will provide benefits for facilities, states (with and without their own systems), local, tribal and EPA programs.

Will a bulk upload feature be available for entering data into this new system?

Yes. While a bulk upload feature is not in the prototype, we do recognize the importance of having this functionality.

How do you envision the addition of CROMERR requirements will be included in the Common Form?

We did not address that in the Quick Start project. We recognize that it needs to be addressed. We want to get to a point where we can have one place where there is identity management and that would be connected in a secure way to what we want to do with the common emissions form, but those were all outside the scope of the functionality they were trying to demonstrate during our prototype. There currently is another project under E-Enterprise which is looking into federated identifications which would include CROMERR requirements.

In what instances has this video been shown previously?

This particular video has only been shown once previously. Members of the CAER team were given a presentation a few weeks prior to this webinar.

You mentioned a priority list. What is this? Can you share the list?

The priority activities list is contained in the Implementation Plan located on the CAER website under the Short Term Wins, [Implementation Plan](#). The priority activities represent both research and prototype work areas which will be the initial focus areas for the Research and Development Teams under the implementation plan.

How well known are the consistent pieces of data? What requirements are directly consistent between programs?

One of the Short Term Wins early on in this process was data harmonization between EIS, TRI, GHGRP, North Carolina and Texas. Those data which are common across these programs were identified. Work in this area will continue under the CAER Product Design Team.

So why, if the EPA and states are partners in this, is this presentation being shown here to states for the first time and at the same time as industry? Probably not the best decision.

The E-enterprise model is based on EPA and, the states and tribes, working together to streamline and modernize the implementation of environmental programs. This presentation was developed with the help of North Carolina, Georgia, Wyoming, Massachusetts, Arizona and Minnesota during a five-day workshop in September, 2016. These presentations are given to a wider audience in order to inform and receive comments. We also solicit state, local and tribal participation on all teams and projects.

The presentation was very basic and not complicated. Details from more complex facilities will bring lots of questions that could not be contemplated with this presentation. I am not sure that this type of demonstration would be effective in a complex environment.

This prototype was developed over a five-day workshop and was kept simple for that reason. One of our priority projects is to develop a more robust prototype which would probably be based on a more complex facility in order to show additional functionality.

When "Be Informed" refers to "state requirements" does that mean "state only" or "state or local"?

It means state, local, or tribal requirements. It just so happened that the only participants in our Quick Start event were states, but the principle applies to any agency to which the facility is required to report.

TRI

Can you elaborate more on what "could make TRI more consistent" with the NEI. Does this mean changes in TRI reporting requirements, changes in TRI pollutant definitions, changes in how TRI facilities are defined?

We don't think that any of those three changes would be needed under what we have envisioned. The TRI reporting requirements for air, in some cases, line up with what is required by states, and, in some cases, there are additional requirements. All of the requirements could be reflected on the form and sent to the appropriate place. For pollutants there is a discrepancy in some cases between TRI pollutants, and pollutants that are very similar but not the same, and what NEI wants. All of the pollutants could be reflected on the form. During the 5-day challenge we identify that when there are closely related pollutants we could, on a more sophisticated common form, provide a mechanism to translate one pollutant to another where that makes sense. So for example, if TRI is requesting reporting on a particular compound that has a metal in it and that report is for that particular compound whereas NEI only wants the metal portion of that, one could have a factor that would help the facility to meet both of those without having to do extra work. And then the TRI facility definitions, we believe that by breaking the facility down into its parts and indicating which of those parts are part of the TRI facility vs another facility and with the concept we showed of pre-populating information into TRIme web we would be able to pre-populate for the TRI facilities irrespective of how those

facilities are being reported to the other agencies so long as we have correctly identified which parts of a facility are considered one TRI facility or another. The CAER Product Design Team has also selected this issue as possibly one of their initial priority research projects.

Does the common form transmit to the air emissions part of the TRI Form R?

During our five-day workshop we did talk about using the common form to prefill Form R. More research will need to be done and will probably be included in the above product design team project.

What input has been received from State TRI staff, as opposed to EPA Headquarters TRI staff?

States have been involved in the CAER project since the beginning.

There are a significant number of true minor sources in TRI that we do not have in our database (SLEIS). What's their status in this new system?

We will be considering the implication of minors as part the product design team.

On the Common Form, are we looking at having this fulfill industry's reporting requirements to state EIs and to TRI with one report?

This could be an ultimate objective, however the starting point of course in most cases is to fully satisfy the state requirements. The objective with CAER would be to provide a platform for sharing the emissions data, ensuring that all requirements are met for the facility and for reporting to the state. And then to share emissions that would also be used for TRI reporting as well. There will be issues with timing that will have to be looked at in terms of when the submittal times are and it won't replace the need for the formal requirements for TRI to report. But the idea would be to use a consistent piece of data that both programs share in meeting their requirement and then you have a common sharing of data to avoid duplication or inconsistency in data sets. You can envision an ideal state where potentially, if it's well coordinated and timed out, it could transfer the data simultaneously but in reality that probably won't be the way to start – it will be meeting the requirements and sharing the data.

Instead of uploading partial data (air only) into TRI, have you considered downloading the air emissions data from TRI into the common form?

This will be considered under the product design team research project on TRI.

Who will be aligning the facility names, addresses, etc. between TRI and EIS?

All facility attributes would reside in the Facility Registry System (FRS) and would be shared with all stakeholders. This method will ensure that everyone is working with the same data. A separate E-Enterprise project known as the Facility Integrated Planning Team (IPT) is addressing the protocol and procedures on how the facility information will be shared and submitted to FRS.

Will facilities be expected to continue filling out Forms R AND make electronic submissions under CAER?

In the Quick Start example what we tried to show is that the common form would be able to provide information for use by the TRI, the TRIme web, the online form. And exactly how that transfer would happen we don't know yet, but we did illustrate in this example that that could be converted to XML, and we are already aware that is something that you could upload to TRI or could be done automatically. The extent of that automation, how it would be transferred, etc. is yet to be determined but the capability is certainly there and the TRI representatives who were there from OCSCP and from OEI were very supportive and their management is enthusiastic. There will be some ability to transfer that information and not have to report it twice. But in this particular example we did not try to completely rework the TRIme web approach of reporting so the user in this example would still go to TRIme web, fill out the other information that they haven't already provided for solid waste and water emissions if they have those and then sign things off in TRIme web. In the future maybe we can streamline things further but that's what we were illustrating in this example. We are striving to move towards a single facility submission which would meet multiple reporting requirements; however, until such time all facilities will need to continue to follow all the existing TRI program reporting requirements.

Is it planned to have instances where the pollutants are not consistent across programs be repeated once for each program in the common form?

This question is being considered under the product design team research project on TRI.

GHG

Where does GHG reporting through eGGRT fit into this?

There is another product design team project being considered to look at state/local/tribal air agencies who are collecting GHG pollutants and how these data can be shared.

CODES

Who is going to maintain reference tables for things like SCC Codes, Pollutant Codes, etc. - Is this something that would be manually updated by the State or would it be linked to EIS or another system and automatically updated?

Codes such as SCC and pollutants will be handled by a centralized system with web services available to state/local and tribal agencies. This web service and SCC lookup will be available in December.

System appears to be heavily dependent of SCC's. What are the current limitations of the SCC as classification system given that this has grown haphazardly over the years, sometimes process-based, sometimes industry based? What improvements are planned to SCC's?

We are always interested in getting specific comments on problematic SCCs. The SCC represents the processes that exist in the real world and while we recognize that there are certainly some challenges with the existing system we don't need to necessarily feel like we have to do any kinds of wholesale improvements other than continuing to review by particular sector and add new SCCs where new things are being done and remove old things that are no longer done, if that's appropriate. To help support this goal, one of the CAER Short Term Wins was to develop an SCC web service which would allow state/local and tribal agencies to integrate this code list into their own systems. Secondly it also established a master look up table for facilities, state/local, tribal air agencies and the public. Requests for SCCs can be done through this look-up service. Both services will be available in December. A review of SCCs will be undertaken.

The ability to add new SCC codes and / or pollutant CAS appeared to be very basic in input. These should be driven by combo boxes that select from a specified list to avoid typos. What is the ability to modify or correct an input such as these?

We will be looking at this when the more developed prototype is created. Remember that this prototype was developed within a five-day workshop and we could not include all functionality at that time.

It seems like the common form requires the use of common tools such as a pollutant registry, a SCC list, etc. Are there plans to identify these tools, ensure there are not gaps, and test them out prior to use within this type of use?

Your observation is correct. We are in the process of identifying which code tables are good candidates for centralization and availability through web services

QA/QC

It appears that QA/QC from batch submittals will be rather complicated - not clear from this presentation how that will be handled.

One of the priority projects under the Product Design Team is the review of existing QA/QC protocol used for emission data submittals and development of a shared, uniform set of QA/QC checks that could potentially be part of a centralized QA/QC service. Working with batch submittals should also be a consideration for that project.

If the QA process raises a flag, who is responsible to check and fix?

In the context of the examples presented today, the industry will be getting that feedback while they're reporting. It depends on the particular QA check – if the QA check is you haven't included a required pollutant, the workflow might be set to not allow the form to be submitted until the required pollutant is provided. There could be other QA checks that are warning that something seems high, low, etc. and there may be some other process for those, by which that information is provided along with the submission, but it can still be submitted. We haven't worked out all those details but we think the responsibility of accurate data is on the facilities that are

reporting and that's no different than what we have now. The responsibility to evaluate what has been reported is on government agencies and the ultimate end result of the collaborative effort of both government and industry is to make sure we have the best available information that's accurate.

How does a state reject a given pollutant submittal and how does that get resolved? This usually takes time to work with the facility to understand the bad data.

Existing program procedures for identifying errors and working with reporters to fix those can and will likely continue as is. The common form approach may improve the QA/QC process by allowing the application for checks and review in a more efficient manner. The idea that there's work that has to happen between the state and the facility we tried to represent that conceptually that there's that approval step but we didn't work through the nitty gritty of a specific state situation and exactly how they would like that process to work and model maybe multiple steps and a workflow and people involved in that sort of review. Conceptually that's something that can be built into something like this. You can also, depending on the particular state, local, or tribal agency, their system maybe is handling that now and if they are receiving the data that could be handled as usual. And then when the changes are made that would feed back into the common form rather than have to get resolved before the state received the data. There are a number of things that could be done. Every state, local and tribal agency probably will be different.

Has there been any thought provided concerning potential-to emit (PTE) or permit limits so a QA check could be added to look for a permit exceedance?

This subject did come up during our five-day workshop and generated some interest. More research to this area is needed and will be considered for the Product Design Team.

With this model, states will have to visually inspect every submission. I do understand that automated tools should catch most of the data issues. However, this seems it will be a burden on states that have already established systems with their own quality checks and will the feedback loops allow for correction after a submission is approved?

The intent of any design would be to incorporate the QA/QC checks that the state wishes to use and to allow for those checks to be applied at appropriate points in the process, and to automate them where possible.

SLT

All four state examples show facilities directly entering data into CEF – none show facility using state interface, then state system pushing data to Cefni a state wants to keep its own software and database, will a facility first need to log into the CAER application just to get to the State's system?

We had two states at the Quick Start workshop (Wyoming and South Carolina) that expressed interest in keeping their existing reporting interface with industry, so it would look the same to them. In these cases, the common form would need to be

linked to the data coming in from their interface and then be transferred over to the common form. Then from that platform they could do the emissions sharing to other programs that was shown in the examples. There's interest in some states that the look to the industry be the same and not be replaced by the common form as the first part. In essence, a facility would not see any difference in what they are currently doing to meet their requirements. We talked to the Be Informed people and there is the capability to have that built into the system. During the Quick Start week, we didn't have access to actually be able to start manipulating a state's interface to actually illustrate the adoption by a state's interface of parts of a common form approach, so that's why it wasn't illustrated today. That might be a possible example of another topic for further prototyping.

If a state were to submit emissions inventory data through batch upload in EIS, would a facility then be able to view its submitted information under the common form?

The application of the common form also has various report capabilities, which can could potentially include some format for facility review functions. The exact specifications for these reports would need to be established to meet each SLT's program's needs.

A more robust approval process for the CEF would allow the S/L/T to *edit* the data before approving it, or to approve some processes but not others.

We've showed a very simple approval process in the Quick Start and each state will have their own business rules, we think, about how they handle industry submissions and what they want to be able to do with those. And we would need to be able to capture those rules in common form workflow. To the extent that the approval and the work like that isn't happening in the state database, (and we think many states would rather have it happening in their database), if it needed to happen in EIS then they would also need to capture that workflow. Also, it is worth noting for the Quick Start examples, in all but one of the examples on how the CEF could work with SLT systems, SLT approval prior to submission to EPA was indicated.

If a state already gathers NEI data, it wouldn't be that hard to add GHG and TRI pollutants to that data gathering. Then the current EIS staging tables could include XML for TRI and GHG along with the EIS XML submittals. This seems a much easier solution as long as EIS data reporting requirements meet the GHG and TRI reporting requirements.

how do we find out which states are participating in this?

There are two priority projects being considered under the Product Design Team which will look at reporting to both GHG, TRI, and NEI and how we can involve SLTs in making these data more consistent across programs.